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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA

In re:

Chapter 13

Michael Sean Tarabochia

Case No. 09-5-2307 RLE

Debtor \_\_\_\_\_ /

AMENDED MOTION TO MODIFY CHAPTER 13  
PLAN

The Debtor respectfully requests that the Court modify the Chapter 13 plan as follows:

- X 1. With respect to the monthly plan payments of \$725, those payments shall:  
X be suspended for the months of March 2010 through April 2010 (including 1 informal suspension totalling \$725).  
\_\_\_\_\_ be increased to \_\_\_\_\_, effective \_\_\_\_\_.  
X be decreased to \$400 x 6 months, effective May 2010.  
\_\_\_\_\_ (other)

- \_\_\_\_\_ 2. With regard to secured claims:  
\_\_\_\_\_ to treat the claim(s) of additional creditors as secured, as follows:  
\_\_\_\_\_ to change the treatment of certain secured claims, as follows:  
\_\_\_\_\_ to treat as unsecured, the claims of the following creditors which were previously treated as secured.

- \_\_\_\_\_ 3. With regard to general unsecured claims, to change the dividend paid:  
\_\_\_\_\_ from \_\_\_\_\_ % to \_\_\_\_\_ %  
\_\_\_\_\_ from a pot plan\* of \$ \_\_\_\_\_ to a pot plan\* of \$ \_\_\_\_\_  
\_\_\_\_\_ from a percentage plan at \_\_\_\_\_ % to a pot plan\* of \$ \_\_\_\_\_  
\_\_\_\_\_ from a pot plan\* of \$ \_\_\_\_\_ to a percentage plan at \_\_\_\_\_ %

\* A pot plan provides for a sum (as specified above) to be distributed pro rata, in amounts determined after allowed administrative, secured and priority unsecured claims are paid. The plan payments will continue at the highest monthly payment provided in the confirmed plan, as it may have been modified, as necessary to pay all allowed administrative, secured and priority unsecured claims within sixty (60) months of the original date of confirmation.

Other modifications:

- \_\_\_\_\_ 4.  
\_\_\_\_\_ 5. Debtor's reason(s) for requesting the above modification are:  
The Debtor has been unemployed for several months now. Due to lack of income the Debtor incurred additional expenses in connection with car repairs and family law legal representation. The Debtor believes that he will be able to afford the reduced plan payments, as proposed.

- \_\_\_\_\_ 6. The plan, if modified, would be completed within sixty (60) months from commencement of the case.

WHEREFORE, the Debtor requests that the Court modify the Chapter 13 plan as set forth above.

Dated: 6-23-10

Norma Hammes  
Attorney for Debtor